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Requirements for sequential and impact assessments for main town centre uses Advice

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Advice note

February 2022

Aims and objectives of the advice note

The council recognises the vital role of town centres, including district and local centres, which are at the heart of our local communities and the need to safeguard their vitality and viability. In doing so, this advice note has been prepared drawing together the guidance set out within the National Planning Policy Framework (NPPF), the Town Centres Planning Practice Guidance and policy contained in the Blackpool Local Plan.

This document provides clarification on when a sequential assessment and impact assessment is required and sets out what information the council expects to be submitted in support of any application which proposes main town centre uses which are not in a designated centre and are not in accordance with the Development Plan. This is to ensure that proposals for main town centre uses in edge-of-centre or out-of-centre locations are accompanied by sufficiently robust sequential appraisals and impact assessments to enable well-informed and sustainable decision-making.

Definitions

Annex 2 of the National Planning Policy Framework (July 2021) defines the following:

Town centre

Area defined on the local authority’s policies map, including the primary shopping area and areas predominantly occupied by main town centre uses within or adjacent to the primary shopping area. References to town centres or centres apply to city centres, town centres, district centres and local centres but exclude small parades of shops of purely neighbourhood significance. Unless they are identified as centres in the development plan, existing out-of-centre developments, comprising or including main town centre uses, do

not constitute town centres.

Main town centre uses

Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs casinos, health and fitness centres, indoor bowling centres and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

Edge of centre

For retail purposes, a location that is well connected to, and up to 300 metres from, the primary shopping area. For all other main town centre uses, a location within 300 metres of a town centre boundary. For office development, this includes locations outside the town centre but within 500 metres of a public transport interchange. In determining whether a site falls within the definition of edge of centre, account should be taken of local circumstances.

Out of centre

A location which is not in or on the edge of a centre but not necessarily outside the urban area.

Main town centre uses in Blackpool – a planning perspective

The Blackpool borough is somewhat unique in planning terms as far as main town centre uses are concerned for two key reasons:

- We are one continuous and compact urban area. Our neighbouring boroughs of Fylde and Wyre, for example, comprise multiple settlements of different scales, dispersed across a wide area, each with their own function, catchment and community centre provision.
- We are a town for residents and tourists. This means that in addition to our defined town centre, district and local centres, we have the defined resort core which is a focus for leisure and entertainment uses and for holiday accommodation.

Blackpool's strength and vitality as a town has always gone hand in hand with its appeal and success as a resort. In the 1960s and into the 1970s, Blackpool was the place to shop and could boast the best of shows and entertainment. As tourism declined in the 1980s and 1990s as a result of mounting competition from affordable package holidays overseas, the town centre saw a marked reduction in the quality of provision and an increase in vacancy rates.

In the 21st century, the town's deprived population demographic, limited geographic catchment and relatively low-spending power has seen major national multiples leave the borough, often to be replaced by temporary or low-cost retail uses. Following its expansion in 2008, the Houndshell Shopping Centre functions well, but the relocation of national multiples into this centre has again left vacancies and the town centre lacks a strong, high-quality retail offer.

Although Blackpool is identified as a sub-regional centre, given the relative proximity of Manchester, Liverpool and the Trafford Centre, it is considered to be a secondary destination. As such, its struggle to maintain a strong retail offer reflects the growing preference nationally for shoppers to travel further to primary centres or to shop online. The trend for major high-street names such as Marks and Spencer to abandon town centre locations in favour of out-of-centre retail parks has further impacted upon the town's vitality. More recently, the COVID pandemic has further hit town centres, with once major operators such as Debenhams, WHSmiths and the Arcadia group going into administration.

Blackpool's town centre, along with its network of district and local centres lies at the heart of the Blackpool community. Whilst our dual function as a tourist destination has been intertwined with the decline of our town centre offer, Blackpool is uniquely placed to take advantage of the opportunities presented by the ongoing regeneration of the wider resort. The links to the Promenade and resort core give the town a strong leisure offer. The extension of the tramway up to Blackpool North railway station will improve accessibility, and the development of quality new town-centre hotels will provide appealing accommodation for visitors. Shopping is increasingly viewed as a leisure activity with a recognised need for greater fluidity and mix of retail, food and drink, culture and recreation uses to provide a dynamic and responsive town centre.

To take maximum advantage of these opportunities to safeguard and enhance the vitality of the town centre and retail hierarchy, it is imperative that proposals for edge and out-of-centre development be resisted unless it can be demonstrated that suitable sequentially preferable sites are unavailable, and that the development can be delivered without significant adverse impact.

Relevant planning policy, guidance and information

National Planning Policy Framework (NPPF) (published July 2021)

Section 7 of the July 2021 NPPF relates to ensuring the vitality of town centres.

Paragraph 87 states that a sequential test should apply to all planning applications for main town centre uses which are neither in an existing centre nor in accordance with an up-to-date plan. Main town centre uses should be located in town centres, then in edge of centre locations; and only if suitable sites are not available (or expected to become available within a reasonable period) should out of centre sites be considered.

Paragraph 88 states that when considering edge of centre and out of centre proposals, preference should be given to accessible sites which are well connected to the town centre. Applicants and local planning authorities should demonstrate flexibility on issues such as format and scale, so that opportunities to utilise suitable town centre or edge of centre sites are fully explored.

Paragraph 89 confirms that the sequential approach should not be applied to applications for small scale rural offices or other small scale rural development.

Paragraph 90 relates to impact assessments and stipulates that an impact assessment is required for retail and leisure schemes of more than 2,500sqm gross floorspace, unless a locally adopted threshold is in place. An impact assessment should include assessment of:

- a) the impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal; and
- b) the impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and the wider retail catchment (as applicable to the scale and nature of the scheme).

Paragraph 91 makes it clear that applications which fail the sequential test or are likely to have significant adverse impact on one or more of the considerations in paragraph 90 should be refused.

National planning practice guidance (NPPG)

The NPPG includes a section on 'town centres and retail'. This offers some useful guidance on the preparation and application of sequential appraisals and impact assessments. In particular:

- Paragraphs 009 to 013 provide further detail in respect of the application of the sequential test
- Paragraphs 014 to 018 provide further detail in respect of the application of the impact test.

The guidance can be found on the [gov.uk website](https://www.gov.uk)

Blackpool Local Plan Part 1: Core Strategy 2012-2027 (adopted January 2016)

The Blackpool Core Strategy sets out a spatial portrait of Blackpool along with a vision and objectives to identify how we want Blackpool to be at the end of the plan period. The plan also sets out a number of planning policies to ensure that the right development happens in the right places to meet Blackpool's needs.

Policy CS4: Retail and Other Town centre Uses is particularly relevant. This policy states that:

Policy CS4: Retail and other town centre uses

1. In order to strengthen Blackpool Town Centre's role as the sub-regional centre for retail on the Fylde coast, its vitality and viability will be safeguarded and improved by:
 1. Focusing new major retail development in the town centre to strengthen the offer and improve the quality of the shopping experience
 2. The preparation and implementation of a Town Centre Strategy and Action Plan, working with stakeholders to arrest decline and restore confidence in the town centre
1. For town, district and local centres within the borough, retail and other town centre uses will be supported where they are appropriate to the scale, role and function of the centre.
1. In edge of centre and out of centre locations, proposals for new retail development and other town centre uses will only be permitted where it can be demonstrated that:
 1. It is a tourism attraction located in the resort core in accordance with Policy CS21; or
 2. There are no more centrally located/sequentially preferable, appropriate sites available for the development; and
 3. The proposal would not cause significant adverse impact on existing centres; and
 4. The proposal would not undermine the council's strategies and proposals for regenerating its centres; and
 5. The proposal will be readily accessible by public transport and other sustainable transport modes
1. The council, through the Site Allocations and Development Management DPD, will identify a range of sites for new retail development in Blackpool town centre to allow for new comparison goods floorspace over the plan period.

Emerging Blackpool Local Plan Part 2: Site allocations and development management policies

The Local Plan Part 2 was subject to Examination in Public from 6 December 2021. The Inspector's comments are expected in spring 2022. Dependent upon the nature of those comments, amendments and re-consultation may be necessary. Nevertheless, a degree of weight can be attached to the emerging policies in Part 2 in accordance with paragraph 48 of the NPPF. The following draft policies are most relevant:

- DM11 – Primary Frontages – this policy explains which uses are considered appropriate in the designated primary frontages as defined on the policies map.
- DM12 – Secondary Frontages – this policy explains which uses are considered appropriate in the designated secondary frontages as defined on the policies map.
- DM14 – District and Local Centres – this policy explains which uses are considered appropriate in designated district and local centres as defined on the policies map and also how proposals for conversion of main town centre uses to other uses will be considered. The policy sets out how the impact of a proposal on the retail function of a centre will be considered.
- DM15 – Threshold for Impact Assessment – this policy establishes the following thresholds and goes on to state that the scope and content of impact assessments must be agreed with the Local Planning Authority:
 - 500sqm gross floorspace; or
 - 300sqm gross floorspace within 800m of the boundary of a district centre; or
 - 200sqm gross floorspace within 800m of the boundary of a local centre

Evidence base documents

The following documents are considered to be most relevant to this topic.

[Local Centres Assessment \(April 2019\)](#) – this document provides an overview description and analysis of each designated centre.

[Blackpool Retail, Leisure and Hotel Study \(June 2018\)](#) – this study drew on empirical research to assess shopping and leisure patterns across the defined study area. It evaluates the vitality and viability of the town centre and the designated district centres and provides recommendations. The study has assisted the formulation of development plan policy.

Specific advice

How can I find out the boundaries of the town, district and local centres and the resort core?

The boundaries to all designated centres in the borough can be found on the [Local Plan Proposals Map](#).

Sequential assessment

When do I need to submit a sequential assessment?

A sequential assessment must be submitted as part of any application for planning permission for the development of a main town centre use that is not in a designated centre and not in accordance with the local plan. This includes proposals for the extension of existing uses including mezzanines and proposals to change from one main town centre use to another (where Permitted Development Rights do not apply).

Applicants are advised to liaise with the council prior to the submission of an application to agree a suitable approach in respect of the application submission requirements. The national guidance is clear that not only is the local planning authority expected to support the applicant in undertaking the sequential assessment but that the application of the sequential test will need to be proportionate and appropriate for the given proposal. Agreeing the degree of proportionality will be an important part of the process.

What area of search should a sequential assessment consider?

As part of the process, it will be important to set out the geographic area from which the proposal will likely draw its trade. It is from this 'catchment area' that the search for potential sequential opportunities can be concentrated, focusing on defined centres within that identified catchment. In this regard, it is typically considered that a smaller proposal will draw from a limited catchment, but this will depend on the nature of the proposal, the range of goods to be sold, and so on. For example, a small newsagents is more likely to draw its trade from a very localised, primarily walk-in catchment, when compared to a large foodstore which has a wider draw. It is strongly advised that the applicant agrees the catchment area with the LPA at an early stage of the process.

In accordance with core strategy policy, proposals for leisure and hotel uses will need to consider available sites within the defined resort core (alongside the town centre). Proposals for leisure uses aimed predominantly at the tourist market could reasonably limit

the area of search to the defined town centre and the defined resort core. Proposals for leisure uses aimed at local residents should also consider sites in the defined district centres.

What sort of sites should a sequential assessment consider?

National policy guidance states that both applicants and the local planning authority should demonstrate flexibility in the application of the sequential test, and considers that the application of the test should be proportionate and appropriate for the given proposal.

The sequential assessment should consider the suitability of the most central sites to accommodate the proposal. Where the proposal would be located in an edge of centre or out of centre location, preference should be given to accessible sites that are well connected to the town centre. It is important to set out any associated reasoning clearly. The applicant should also demonstrate flexibility in respect of the format and/or scale of the proposal.

Only if suitable sites in the town centre or edge of centre locations are not available (or are not expected to become available within a reasonable period) should out of centre sites be considered. When considering what a reasonable period is for this purpose, the scale and complexity of the proposed scheme and of potentially suitable town or edge of centre sites should be taken into account.

Use of the sequential test should recognise that certain main town centre uses have particular market and locational requirements which mean that they may only be accommodated in specific locations. Robust justification will need to be provided where this is the case, and land ownership does not provide such a justification.

In undertaking the sequential assessment, applicants should clearly set out a series of site search thresholds, including the site size (having regard to the proposal), matters such as accessibility and visibility, location and so on.

How can I find out what alternative sites are available?

As a starting point the council undertakes a quarterly survey of the defined town centre and can provide a map of vacant units within this area upon request.

Applicants should also use internet search engines to identify potential premises or land and support this by approaching relevant commercial land/property agents to enquire about site availability. National websites such as RightMove and Zoopla can be helpful in looking for available sites, as can more locally-based websites such as Duxburys Commercial, Kenricks Commercial Estate Agents, Kays Estates and Robert Pinkus & Co[*]. To ensure that the search for sites is robust, it is recommended that at least three land/property agents are approached. Where possible, applicants are also expected to visit centres on foot to identify any potential units or sites.

What if I identify an alternative, suitable, available and sequentially preferable site?

If the applicant or the council is able to identify an alternative site which is considered to be both available and suitable, and no robust justification can be provided as to why this site could not accommodate the development proposed, it is likely that planning permission will be refused in accordance with Core Strategy policy CS4 and paragraph 91 of the NPPF.

At all times the council will be mindful of the fact that the purpose of the sequential test is to safeguard the health of designated centres.

How should I present my sequential assessment?

A sequential appraisal should include the following and this list can be used as a template for your submission:

- Description of the proposed use
- The size of the unit (whether existing or proposed)
- The area covered by the sequential search
- Justification for the area searched if it is less than borough-wide or limited to particular types of centre
- The types of units searched for and this search was carried out
- Justification for any limitations applied to the types of units considered
- A list of the alternative, available, sequentially preferable units identified
 - The list should set out the address and size of the unit and if it is considered to be suitable or not.
 - If a unit is considered to be unsuitable, full justification and evidence should be provided alongside the listing
 - A conclusion as to whether or not the sequential test is met, looking at both the availability and suitability of those sites to accommodate the proposal
 - If the sequential test is not met, an explanation of any overriding material considerations that would justify the grant of planning permission.

Impact assessments

When do I need to submit an impact assessment?

An impact assessment should be submitted for all retail and leisure proposals^[1], including the formation of mezzanine floors, changes of use and variations of condition to remove or amend restrictions which are located outside of or on the edge of a defined centre where:

- The proposed floorspace would exceed 500sqm gross; or
- Within 800m of a district centre the proposed floorspace would exceed 300sqm gross; or
- Within 800m of a local centre the proposed floorspace would exceed 200sqm gross.

It is for the applicant to demonstrate compliance with the impact test in support of relevant applications. Failure to undertake an impact test could in itself constitute a reason for refusing permission.

What should my impact assessment cover?

An impact assessment should be proportionate to the scale and potential impact of the proposal. The purpose of an impact assessment is to consider the impacts of the proposal on town centre vitality and viability and investment.

It is for the applicant to demonstrate that the proposal will not have a significant adverse impact on planned and committed town centre investment, or on the vitality and viability of the defined centres. The assessment should consider all town centres which may be affected, not just those located closest to the application site and in some instances may be in neighbouring authority areas.

Guidance on how to apply the retail impact test can be found at Paragraph 18 of the [‘Town centres and retail’ guidance](#).

In order to inform judgements in respect of the likely impact of proposals on established centres, it is necessary to consider the likely diversion of expenditure that may occur when the proposed development is implemented and trading patterns have been established. The council will not expect an applicant to provide a full, detailed quantitative impact assessment for a small proposal, but some consideration of the likely turnover and potential impacts on existing operators will be required.

Whilst the NPPF sets out the second part of the impact test, paragraph 017 of the Town Centres PPG establishes a checklist for its application in practice.

The checklist identifies the following steps:

- establish the state of existing centres and the nature of current shopping patterns at base year;
- determine the appropriate time frame for assessing impact, focusing on impact in the first five years, as this is when most of the impact will occur;
- examine the ‘no development’ scenario;
- assess the proposal’s turnover and trade draw;
- consider a range of plausible scenarios in assessing the impact of the proposal on existing centres and facilities;
- set out the likely impact of that proposal clearly, along with any associated assumptions or reasoning, including in respect of quantitative and qualitative issues; and
- any conclusions should be proportionate; for example, it may be sufficient to give a broad indication of the proportion of the proposal’s trade derived from different centres and facilities in the catchment area and the likely consequences to the viability and vitality of existing centres.

Applicants are strongly encouraged to take advantage of the council’s pre-application advice service to agree the scope of an impact assessment where one is required. Please note that the onus would be on the applicant to provide a framework impact assessment listing the points/information to be covered for comment.

Further information

Pre-application advice

The council offers a pre-application advice service. Applicant’s wishing to develop a new main town centre use may wish to take advantage of this service to establish the likelihood of obtaining planning permission for their proposal and/or to agree the scope of sequential appraisals and impact assessments.

Details of this service can be found on the [council’s planning pages](#).

Public consultation

As this document is intended as an advice note to provide clarification and information, no public consultation has been undertaken on its content.

Useful numbers

[*] Please note that the listing of these companies should not be taken in any way to imply a recommendation of them on behalf of the council. They are simply listed as known property agents operating within Blackpool.

[†] These uses include retail development (including warehouse clubs and factory outlet centres); leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

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